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ROWLAND MARCUS ANDRADE

**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION**

UNITED STATES OF AMERICA,
Plaintiffs,
v.
ROWLAND MARCUS ANDRAD
Defendants.

Case No. 3:20-CR-00249-RS-01 (JCS)

**DECLARATION OF MICHAEL J.
SHEPARD IN SUPPORT OF
DEFENDANT'S *EX PARTE* APPLICATION
FOR ORDER PERMITTING
TRANSCRIPT PREPARATION OF
CONFIDENTIAL HEARING**

1 I, Michael J. Shepard, do hereby state and declare:

2 1. On November 8, 2022, a hearing was held in this matter before the Honorable
 3 Judge Joseph Spero. I attended as Lead Counsel for Mr. Andrade, accompanied by my colleague
 4 Kerrie Dent. Approximately an hour and fifteen-minutes of that hearing was held in a
 5 confidential manner, *ex parte*, without the presence of the government attorneys.

6 2. In late February, 2023, I requested the transcript of the November 8, 2022 hearing
 7 in order to be able to share it with our client. Subsequently, I was contacted by a court
 8 representative, who told me that Ana Dub, the court reporter assigned to produce this transcript,
 9 required a court order to produce and deliver the transcript due to the confidential nature of the
 10 hearing.

11 3. Therefore, I am requesting an order permitting court reporter Ana Dub to prepare
 12 and deliver the transcript to me and my colleague Kerrie Dent. We were both at the hearing and
 13 understand the proceedings were confidential, and will keep the transcript in a confidential
 14 manner, sharing it only with our client and other members of the defense team.

15 4. By this application, I am not seeking an order to unseal the transcript generally,
 16 nor an order to change the confidential nature of the proceedings held on November 8, 2022.
 17 Furthermore, I am not requesting that this transcript be filed on the Court's docket.

18 I declare under penalty of perjury, under the laws of the United States of America, that
 19 the foregoing is true and correct to the best of my knowledge, information, and belief.

20 Executed this 9th day of March, 2023, in San Francisco, California.

21 /s/ Michael J. Shepard
 22 Michael J. Shepard